

FW: Case No.: 1:21-cv-5067, Does et al. v. Hochul, et al. - Complaint and Motion for Temporary Restraining Order

Horatio Mihet <hmihet@lc.org>

Fri 9/10/2021 4:33 PM

To: philip.levitz@ag.ny.gov <philip.levitz@ag.ny.gov>; nyoag.nycpdf@ag.ny.gov <nyoag.nycpdf@ag.ny.gov>; steven.wu@ag.ny.gov <steven.wu@ag.ny.gov>; sandra.pullman@ag.ny.gov <sandra.pullman@ag.ny.gov>; justin.deabler@ag.ny.gov <justin.deabler@ag.ny.gov>
Cc: Roger Gannam <rgannam@lc.org>; Daniel Schmid <daniel@lc.org>

2 attachments (646 KB)

1 Verified Complaint.pdf; 2 Motion for TRO and PI.pdf;

NY AG Counsel:

Although our dealings thus far have been on a different ongoing matter, today I write to provide you with courtesy copies of a Complaint and TRO Motion that we filed this afternoon against various Defendants, including Governor Hochul and DOH Commissioner Zucker. Although formal service of process is underway and should be completed quickly, I wanted to also provide the NYAG with a courtesy copy of the pleadings, in light of the emergency relief we are seeking.

Please route these materials to the relevant personnel.

Regards,

Horatio G. Mihet, Esq.*
*Vice President of Legal Affairs and
Chief Litigation Counsel*

Liberty Counsel

PO Box 540774
Orlando, FL 32854
(407) 875-1776 phone
(407) 875-0770 fax

LC.org

Offices in DC, FL, and VA

*Licensed in Florida and Ohio

This message and any attachment are intended for the person to whom it is addressed. If you are not the intended recipient, notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors that result from email transmissions. Opinions expressed in this email are solely those of the author and do not necessarily represent those of the organization.

From: Daniel Schmid <daniel@lc.org>

Sent: Friday, September 10, 2021 4:11 PM

To: Linda.Ross@trinity-health.org; JSWITZER@WCMC.COM; mclaus@nyp.org; dohweb@health.ny.gov; Letitia.james@ag.ny.gov; Gov.hochul@chamber.state.ny.us

Cc: Roger Gannam <rgannam@lc.org>; Horatio Mihet <hmihet@lc.org>

Subject: Case No.: 1:21-cv-5067, Does et al. v. Hochul, et al. - Complaint and Motion for Temporary Restraining Order

Defendants and Counsel:

In accordance with Fed. R. Civ. P. 65(b)(1), I write to provide notice of a lawsuit that has been brought against you or respective clients. Today, September 10, 2021, Plaintiffs filed a Verified Complaint and a Motion for a Temporary Restraining Order against Governor Kathy Hochul, in her official capacity as Governor of the State of New York, Howard Zucker, in his official capacity as Commissioner of the New York State Department of Health, Trinity Health, Inc., New York-Presbyterian Healthcare System, Inc., and Westchester Medical Center Advanced Physician Services, P.C. seeking a TRO and preliminary injunction against Defendants refusal to provide exemptions and accommodations for Plaintiffs' sincerely held religious beliefs.

Copies of the file-stamped versions of the Verified Complaint and the Motion for Temporary Restraining Order and Preliminary Injunction are attached hereto for your ready reference.

Service of process fill follow.

Regards,

Daniel J. Schmid, Esq.*

Senior Litigation Counsel

Liberty Counsel

PO Box 540774

Orlando, FL 32854

(407) 875-1776 phone

(407) 875-0770 fax

LC.org

Offices in DC, FL, and VA

*Licensed in Virginia

This message and any attachment are intended for the person to whom it is addressed. If you are not the intended recipient, notify us immediately by replying to this message and deleting it from your computer, because any distribution of this message by you is strictly prohibited. Email cannot be guaranteed secure or error-free. We do not accept responsibility for errors that result from email transmissions. Opinions expressed in this email are solely those of the author and do not necessarily represent those of the organization.